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November 4, 2004

VIA ELECTRONIC MAIL SERVICE AND 1ST CLASS MAIL SERVICE

Public Service Commission of South Carolina

ATTN: Docketing Department

PO Drawer 11649

Columbia SC 29211

RE: Application of Symtelco, LLC for a Certificate of Public Convenience and Necessity to Provide Facilities-Based Local Exchange and Resold Long Distance Telecommunications Services, including Operator Services and for Flexible Regulation of its Long Distance Services Within the State of South Carolina

Docket No. 2004-265-C, Our File No. 910-10257

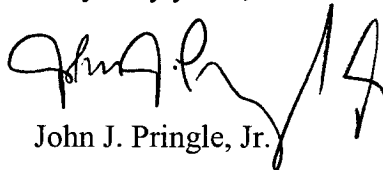
To Whom It May Concern:

Enclosed is the original and twenty-five (25) copies of the **Testimony of Greg Hogan** filed on behalf of Symtelco, LLC in the above-referenced docket.

Please acknowledge your receipt of this document by file-stamping the copy of this letter enclosed, and returning it in the enclosed envelope.

If you have any questions or need additional information, please do not hesitate to contact me.

Very truly yours,



John J. Pringle, Jr.

JJP/cr

cc: Mr. Greg Hogan
Mr. Craig Neeld

Enclosures

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**BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA**

Application of **Symtelco, LLC**)
 For a Certificate of Public Convenience and)
 Necessity to Provide Facilities-Based Local Exchange and)
 Resold Long Distance Telecommunications Services,)
 Including Operator Services, for)
 Flexible Regulation of its Local Exchange Services and)
 Alternative Regulation of its Long Distance Services)
 Within the State of South Carolina)

Docket No. 2004-265-C

Symtelco, LLC

Testimony of

Greg Hogan, President

30 NOV 2004
 2PM 1:54 - 8 PM 8:01
 COMMUNICATIONS
 DEPARTMENT

RETURN DATE: OK D. Werk
 SERVICE: OK D. Werk

1 **Q. State your name and business address.**

2 A. My name is Greg Hogan. My business address is 1385 Weber Industrial Drive, Cumming, Georgia
3 30041.

4 **Q. By whom are you employed and in what capacity?**

5 A. I am the President of Symtelco, LLC. I am primarily responsible for directing the company's entry
6 into new markets and for investigating and developing new lines of business for the company. These
7 responsibilities allow me to interact with all operations of the company.

8 **Q. Please give a brief description of your background and experience.**

9 A. I joined Symtelco in September 2002 with the express purpose of creating a telecommunications
10 company to provide telephone service and other telecommunications services primarily to small
11 businesses. During the past two years we have received certification to provide local service in seven
12 states. We are now providing service in California, Florida, Georgia, Kentucky, Louisiana, North
13 Carolina and Texas. Prior to joining Symtelco, I spent eighteen months as the Director of Sales &
14 Marketing with Ernest Communications, an unbundled network element platform ("UNE-P") based
15 competitive local exchange company serving niche based business customers in over twenty states.
16 While at Ernest I oversaw the Company's doubling in size and implemented progressive customer
17 support practices to ensure each customer's unique needs and demands were not lost in the
18 Company's rapid expansion. Prior to Ernest I served as Vice President of Sales and Marketing for
19 North America at Protel, Inc., a Lakeland, FL based company that is North America's largest
20 provider of public telephones.

21 **Q. What is the purpose of your testimony?**

22 A. The purpose of my testimony is to present evidence describing the technical, managerial and financial
23 fitness of Symtelco to provide resold and facilities-based local telecommunications services and
24 interexchange services in South Carolina. This testimony will also describe the services proposed by
25 Symtelco and the proposed tariff structure. Finally, the purpose of my testimony is to show that the

1 public interest will be served by approval of the application of Symtelco for a certificate of public
2 convenience and necessity.

3 **Q. Has Symtelco registered to do business in South Carolina?**

4 A. Yes. Symtelco received foreign corporation authority in South Carolina on June 3, 2004.

5 **Q. Please explain the Company's corporate structure.**

6 A. Symtelco, LLC is a limited liability company ("LLC") organized in the State of Georgia on
7 September 5, 2002.

8 **Q. Please describe the services Symtelco proposes to offer.**

9 A. Symtelco, LLC will provide local exchange and interexchange telecommunications services and
10 related voice based features primarily to businesses, including collect-only telephone services to
11 confinement institutions. Service will also be provided to payphone providers providing pay
12 telephone service as regulated by the Commission. Service is provided twenty-four (24) hours per
13 day, seven (7) days a week.

14 **Q. Does Symtelco own any network switches or transmission facilities used in routing calls?**

15 A. No.

16 **Q. How will Symtelco bill for its services?**

17 A. Symtelco will bill customers directly. Symtelco's customer bill will contain all information required
18 by Commission Rule 103-622.1.

19 **Q. How are trouble reports handled?**

20 A. Symtelco utilizes a nationwide toll-free number 866-766-1515 for customer service. Customers may
21 access a live customer service representative 24 hours a day, seven days a week.

22 **Q. How are billing errors and complaints handled?**

23 A. Symtelco utilizes a nationwide toll-free number, 866-766-1515, for customer service. Customers
24 may also contact the Company via mail at the headquarters location, or via email at
25 cs@smytelco.com.

1 **Q. Describe the proposed Symtelco South Carolina tariffs.**

2 A. Symtelco has included proposed tariffs that contain the rules, regulations and rates for Symtelco's
3 local exchange, interexchange, and exchange services. Symtelco's services are neither mileage nor
4 time-of-day sensitive.

5 **Q. Does Symtelco provide operator services?**

6 A. Yes. The Company's final tariff will indicate that the maximum rates for operator service charges
7 and surcharges will not exceed those rates mandated by Commission Order 2001-997 issued in
8 Docket No. 2000-407-C. Further, Symtelco is familiar with this Commission's requirements for
9 inmate telephone providers, and will comply with any applicable existing requirements. Finally,
10 Symtelco is in the process of seeking payphone service provider ("PSP") certification from this
11 Commission, and will comply with all applicable PSP Guidelines

12 **Q. Where is Symtelco currently certificated?**

13 A. The Company is certificated in California, Florida, Georgia, Kentucky, Louisiana, North Carolina and
14 Texas. In addition the Company currently has an application pending in Mississippi. Symtelco has not
15 been denied certification from any state utility commission nor has it had a certificate revoked in any
16 state.

17 **Q. Describe Symtelco's financial ability to operate as a telecommunications provider.**

18 A. Symtelco has ample capital to provide the services for which authority is requested. Symtelco is
19 providing its most recent Income Statement and Balance Sheet as proof of its financial stability to
20 provide the required services within the State of South Carolina. This information is attached and
21 labeled for identification purposes as Exhibit C of the Company's Application.

22 **Q. Do you believe Symtelco is capable of delivering its proposed services in South Carolina?**

23 A. Yes, in addition to having sufficient financial resources, the senior management team of Symtelco
24 has a varied and detailed background in telecommunications. In addition, Symtelco has experience
25 offering telecommunications services on a facilities-basis in California, Florida, Georgia, and

1 Kentucky.

2 **Q. Where in South Carolina does Symtelco intend to offer its services and how will those services**
3 **be offered?**

4 A. Symtelco intends to offer local telecommunications service via UNE-P, and interchange services
5 through resale, throughout the BellSouth serving area to residential and business customers.

6 **Q. Does the Company have offices in South Carolina?**

7 A: No. At least initially, the Company does not intend to have offices in South Carolina. Accordingly,
8 the Company requests, pursuant to Commission Rule 103-610, that the Commission authorize the
9 Company to keep its books and records at its offices in Georgia. Upon request, the Company will
10 provide such books and records to the Commission and its Staff on an expedited basis and at the
11 Company's expense.

12 **Q. What regulatory treatment is Symtelco seeking for its local exchange services?**

13 A: Symtelco requests that the Commission allow the Company to employ a flexible local exchange rate
14 structure first authorized by Order No. 98-165 in Docket No. 97-467-C. Specifically, Symtelco
15 requests that the Commission: a) adopt for its local exchange services a competitive rate structure
16 incorporating maximum rate levels with the flexibility for rate adjustment below the maximum rate
17 levels; and b) presume that Symtelco's tariff filings for local exchange services be valid upon filing,
18 subject to the Commission's authority, within thirty (30) days, to institute an investigation of such
19 filings. At the discretion of the Commission such filings may be suspended pending further order of
20 the Commission and any such filings may be subject to the same monitoring process as the
21 Commission applies to other, similarly situated carriers.

22 **Q. What regulatory treatment is Symtelco seeking for its interexchange services?**

23 A: Symtelco requests that its business service offerings be regulated pursuant to the procedures
24 described and set forth in Order Nos. 95-1734 and 96-55 in Docket No. 95-661-C, as modified by
25 Order No. 2001-997 in Docket No. 2000-407-C. Specifically, Symtelco requests that the

1 Commission regulate its business services in the same manner as the Commission regulates those of
2 AT&T Communications of the Southern States, Inc. ("AT&T"). Further, Symtelco requests that the
3 Commission: a) Remove the maximum rate tariff requirements for Symtelco's business services and
4 future private line, and customer network-type offerings; b) Presume that Symtelco's tariff filings for
5 these services be valid upon filing. However, if the Commission institutes an investigation of a
6 particular filing within seven (7) days, the tariff filing will be suspended until further order of the
7 Commission; and c) Grant Symtelco the same treatment as AT&T in connection with any future
8 relaxation of the Commission's reporting requirements.

9 **Q. Will the Company file all applicable reports as required by the Commission?**

10 A: Yes. The Company is aware of the Commission's requirements that all telecommunications carriers
11 file one or more reports on South Carolina operations, a gross receipts report, and a universal service
12 fund contribution report on an annual basis.

13 **Q. How will South Carolina consumers benefit from Symtelco's services?**

14 A. Granting Symtelco's application will introduce a telecommunications service provider committed to
15 providing high quality, innovative, and technologically advanced services that will further increase
16 telecommunications competition within the State of South Carolina. Symtelco's service offerings will
17 increase consumer choice, improve the quality and efficiency in telecommunications services and will
18 likely lead to the reduction of consumer costs, as well as stimulate development of additional services
19 by providing competitive incentives to other providers. Thus, granting Symtelco's application is in
20 the public interest.

21 **Q. Does this conclude your testimony?**

22 A. Yes.